



## **Report of Management on Compliance**

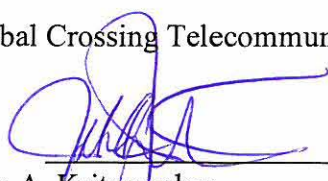
### **With the Federal Communications Commission's Third Payphone Order<sup>1</sup>**

Management of Global Crossing Telecommunications, Inc. ("Global Crossing") is responsible for complying with the requirements set forth in the Federal Communications Commission's 03-235<sup>1</sup> ("Third Payphone Order"). Management also is responsible for establishing and maintaining effective internal control over compliance with the Third Payphone Order. Management has performed an evaluation of Global Crossing's compliance with the requirements set forth in Appendix C of the Third Payphone Order, included as Exhibit A, for the period July 1, 2008 through June 30, 2009. Based on this evaluation, we assert that for the period July 1, 2008 through June 30, 2009, Global Crossing complied with the requirements set forth in the Third Payphone Order.

No material changes have occurred concerning Global Crossing's compliance with the criteria<sup>2</sup> of the Third Payphone Order since the prior year's Report of Management on Compliance with the Federal Communications Commission's ("FCC") Third Payphone Order dated August 4, 2008.

Global Crossing Telecommunications, Inc.

August 3, 2009

By:   
John A. Kritzmacher  
Executive Vice President and  
Chief Financial Officer

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<sup>1</sup> Refers to the Federal Communications Commission ("FCC") FCC 03-235 ("Third Payphone Order" or the "Order"), *In the Matter of The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-128, Report and Order, released October 3, 2003 by the FCC, the Order Reconsideration released October 22, 2004 by the FCC, and the Request to Update Default Compensation Rate for Dial-Around Calls from Payphones released August 12, 2004 by the FCC. The requirements of the Third Payphone Order are set forth in the Appendix C of the above referenced Report and Order.

<sup>2</sup> See Exhibit A of this report for a list of the Third Payphone Order's nine requirements.

## **Exhibit A**

### **Compliance Requirements Covered in the Payphone Audit**

The requirements that were covered in the Payphone Audit are contained in CC Docket No. 96-128, Appendix C - Final Rules, under 64.1320 Payphone Call Tracking System Audits, of the Federal Communications Commission's rules and regulations. Below is a listing of those requirements.

The following criteria will be audited to ensure the switch-based reseller (SBR) is in compliance with the order:

(c) The Completing Carrier must comply with, and the third-party auditor must verify, the Completing Carrier's compliance with the following factors in establishing a call tracking system pursuant to section 64.1320(c):

- (1) Whether the Completing Carrier's procedures accurately track calls to completion;
- (2) Whether the Completing Carrier has a person or persons responsible for tracking, compensating, and resolving disputes concerning payphone completed calls;
- (3) Whether the Completing Carrier has effective data monitoring procedures;
- (4) Whether the Completing Carrier adheres to established protocols to ensure that any software, personnel or any other network changes do not adversely affect its payphone call tracking ability;
- (5) Whether the Completing Carrier has created a compensable payphone call file by matching call detail records against payphone identifiers;
- (6) Whether the Completing Carrier has procedures to incorporate call data into required reports;
- (7) Whether the Completing Carrier has implemented procedures and controls needed to resolve payphone compensation disputes;
- (8) Whether the independent third-party auditor can test all critical controls and procedures to verify that errors are insubstantial; and
- (9) Whether the Completing Carrier has in place adequate and effective business rules for implementing and paying payphone compensation, including rules used to:
  - (i) identify calls originated from payphones;
  - (ii) identify compensable payphone calls;
  - (iii) identify incomplete or otherwise noncompensable calls; and
  - (iv) determine the identities of the payphone service providers to which the Completing Carrier owes compensation.